

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Case No. 7:23-cv-897

IN RE:)	
)	
CAMP LEJEUNE WATER LITIGATION)	JOINT STATUS REPORT AND
)	JOINT MOTION FOR EXTENSION OF
This Document Relates To:)	DEADLINES IN INDIVIDUAL CASES
ALL CASES)	PENDING THE FILING OF A
)	GLOBAL CASE MANAGEMENT ORDER
)	

Plaintiffs’ Lead Counsel J. Edward Bell III, Plaintiffs’ Co-Lead Counsel & Government Liaison Zina Bash, and counsel for Defendant United States of America (the “Parties”) respectfully provide this Honorable Court with the following Status Report.

In addition to informing the Court of progress already made, the Parties also hereby request that this Court issue an order extending all individual case deadlines in cases filed under the Camp Lejeune Justice Act (“CLJA”) through September 1, 2023, pending the filing of a proposed Global Case Management Order. The proposed order will address, among other things, an imminent deadline for filing a master complaint, a deadline for a master responsive pleading, and other case-related deadlines pertaining to the prompt completion of discovery and the commencement of bellwether trials.

The Parties state the following:

(1) Plaintiffs’ Lead and Co-Lead Counsel (the “Leadership Counsel”) have formally convened twice since the July 19, 2023, issuance of Case Management Order 1 (DE 10). Leadership Counsel’s meetings have been productive and efficient, and the work of Leadership Counsel and government counsel in resolving this matter is underway.

(2) As required by Case Management Order 1, Leadership Counsel will notify this Court of the members of the Plaintiffs' Executive Committee and Plaintiffs' Steering Committee on or before July 31, 2023.

(3) On July 25, 2023, Mr. Bell and Ms. Bash met with government counsel in Washington D.C. Many topics of substance and procedure were discussed, and a plan to move the CLJA cases towards resolution is taking shape.

(4) In particular, and without limitation, the Parties discussed matters of global case management (including the development and filing of a master complaint and short-form complaint), the creation of a global database and matrix, and a document-request-form process that the government will use to streamline requests from relevant federal agencies to retrieve necessary plaintiff records.

(5) Currently, the government, plaintiffs' attorneys, and *pro se* plaintiffs are under varying individual court-ordered deadlines in individual cases to file responsive pleadings, engage in individual Rule 26(f) conferences, and prepare individual Rule 26(f) reports.

(6) To allow the government to conserve its limited resources and focus on quickly moving this litigation forward on a global basis, the Parties respectfully request that all responsive pleading deadlines, discovery deadlines, and all other deadlines in individual CLJA cases in this district be briefly extended through September 1, 2023, pending submission by the Parties of a proposed Global Case Management Order that will establish a deadline for filing a master complaint, short-form complaint, and master responsive pleading, among other things.

(7) During the extension, rather than devoting further resources to answering individual complaints and preparing for dozens of individual discovery conferences on a case-by-case basis, the Parties will focus on the global issue of proposing a process for master pleadings

that would supersede individual CLJA complaints and previously filed answers. During this time, the Parties will also negotiate a framework for case management beyond the pleading stage and continue work on a global database, among other things.

(8) The Parties have already conferred substantially and can submit the contemplated proposed Global Case Management Order addressing the deadline for filing a master complaint and master responsive pleading on or before August 28, 2023.

(9) The Parties have attached a proposed Order implementing this extension in current CLJA cases as well as future CLJA cases, if any, that are filed before a master complaint and master responsive pleading process is in place.

WHEREFORE, the Parties respectfully submit this Joint Status Report and further respectfully request that the Court enter the attached Proposed Order briefly extending all individual deadlines in CLJA cases through September 1, 2023.

DATED this 28th day of July, 2023.

Respectfully submitted,

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